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7 UNITED STATES BANKRUPTCY COURT
8 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

9 In re:) Case No. 11-44427-C-7
10) Chapter 7
11 CHAD MILLER and) Docket Control No.: CAH-001
12 CRYSTAL MARTIN,)
13) Judge: Christopher Klein
14) Date: 12/20/2011
15 Debtors.) Time: 9:30 AM
16) Place: 501 I Street, 6th Floor
17) Sacramento, CA 95814
18) Department C – Courtroom 35
19) Trustee: Kimberly J. Husted
20)
21) **MOTION TO REQUIRE THE**
22) **TRUSTEE TO ABANDON ALL THE**
23) **PROPERTIES LISTED ON SCHEDULE**
24) **“A” OF DEBTORS’ PETITION**
25) **[11 U.S.C §554(a)]**
26)
27)
28)

19 The Debtors move, by and through their attorney, C. Anthony Hughes, that the Court
20 requires the trustee to abandon all the real properties listed on Schedule “A” (Exhibit “A”) of
21 Debtors’ Petition pursuant to 11 U.S.C. §554(b).

22 These properties were owned by the Debtors at the date of filing and are valued less than
23 what is owed on the secured liens (Exhibit “D”).

24 There is no equity in these properties. Under 11 U.S.C. §554(a), the trustee may abandon
25 any property that is burdensome to the estate or that is of inconsequential value and benefit to the
26 estate.

1 **WHEREFORE**, Debtors pray that the court will grant this motion to require the trustee
2 to abandon all the properties listed on Schedule "A" of Debtors' Petition.

3
4 Dated: 11/18/2011

By: /s/ C. Anthony Hughes
C. Anthony Hughes